

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**FANECA OBJECTORS' RESPONSE TO
CO-LEAD CLASS COUNSEL'S MOTION FOR EXTENSION OF TIME**

As the Court is aware, on January 11, 2017, the Faneca Objectors filed a Petition for an Award of Attorneys' Fees and Expenses in recognition of the \$102.5-million benefit that the Faneca Objectors' efforts brought to the class. *See* Dkt. No. 7070. On February 13, 2017, Co-Lead Class Counsel filed their fee petition. *See* Dkt. No. 7151. One week later, class member Cleo Miller, represented by attorney John J. Pentz, filed an objection to both fee petitions. *See* Dkt. No. 7161. Co-Lead Class Counsel now move for an extension of time to file a consolidated response to the Faneca Objectors' fee petition, the Miller objection, and several additional filings related to Co-Lead Class Counsel's petition for attorneys' fees. *See* Dkt. No. 7228.

The Faneca Objectors agree that coordinated briefing would serve the interests of judicial efficiency. Thus, the Faneca Objectors do not oppose Co-Lead Class Counsel's request for an extension of time until March 16, 2017, to file a consolidated response to the Faneca Objectors' fee petition, the Miller objection, and the other filings.

Consistent with that approach, the Faneca Objectors request leave to file a single, consolidated brief that addresses all responses to their fee petition on or before April 6, 2017. Given the complexity of the issues and the length of time Co-Lead Class Counsel have had to respond to the Faneca Objectors' petition,¹ the Faneca Objectors respectfully submit that up to 21 days is a reasonable amount of time to allow for a reply.

Dated: March 1, 2017

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Respectfully Submitted,

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¹ The Faneca Objectors filed their petition on January 11, 2017. See Dkt. 7070. Over two months will have elapsed by the time Co-Lead Class Counsel respond on March 16, 2017.

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2017, I caused the foregoing Faneca Objectors' Response to Co-Lead Class Counsel's Motion for Extension of Time to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

/s/ Steven F. Molo